

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ADT LLC, and ADT US HOLDINGS, INC.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 3:15-cv-02252-G
	§	
CAPITAL CONNECT, INC.;	§	
POWER HOME TECHNOLOGIES, LLC;	§	
SECURITY INVESTMENTS LLC;	§	
ALLIANCE SECURITY INC.;	§	
MAXIMUM SECURITY ALARM, INC.;	§	
JOHN LEE; JOHN BACKUS;	§	
VICTOR VEGA; TREVOR MCALEES;	§	
And ANTHONY BONARDI,	§	
	§	
Defendants.	§	

**DEFENDANT ALLIANCE SECURITY INC.'S ANSWER TO
PLAINTIFF'S PETITION**

Defendant Alliance Security Inc. ("Alliance") files this Answer to Plaintiffs ADT, LLC and ADT US Holdings, Inc.'s (together, "Plaintiffs" or "ADT") Complaint, and would respectfully show as follows:

I. PARTIES

1. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 1 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

2. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 2 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

3. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 3 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

4. Admitted.

5. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 5 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

6. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 6 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

7. Admitted.

8. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 8 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

9. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 9 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

10. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 10 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

11. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 11 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

12. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 12 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

13. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 13 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

JURISDICTION AND VENUE

14. Admitted

15. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 15 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

16. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 16 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

17. Denied.

FACTS COMMON TO ALL COUNTS

18. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 18 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

19. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 19 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

20. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 20 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

21. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 21 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

22. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 22 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

23. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 23 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

24. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 24 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

25. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 25 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

26. Denied as to Defendant Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 26 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

27. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 27 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

28. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 28 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

29. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 29 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

30. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 30 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

31. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 31 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

32. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 32 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

33. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 33 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

34. Denied as to Alliance. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 34 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

35. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 35 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

36. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 36 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

37. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 37 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

38. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 38 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

39. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 39 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

40. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 40 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

41. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 41 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

42. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 42 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

43. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 43 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

44. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 44 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

45. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 45 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

46. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 46 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

47. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 47 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

48. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 48 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

49. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 49 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

50. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 50 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

51. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 51 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

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56. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 56 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

57. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 57 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

58. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 58 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

59. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 59 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

60. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 60 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

61. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 61 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

62. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 62 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

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66. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 66 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

67. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 67 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

68. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 68 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

69. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 69 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

70. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 70 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

71. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 71 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

72. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 72 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

73. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 73 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

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76. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 76 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

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80. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 80 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

81. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 81 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

82. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 82 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

83. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 83 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

84. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 84 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

85. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 85 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

86. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 86 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

87. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 87 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

88. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 88 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

89. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 89 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

90. In Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 90 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

91. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 91 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

92. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 92 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

93. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 93 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

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96. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 96 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

97. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 97 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

98. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 98 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

99. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 99 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

100. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 100 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

101. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 101 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

102. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 102 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

103. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 103 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

104. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 104 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

105. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 105 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

106. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 106 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

107. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 107 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

108. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 108 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

109. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 109 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

110. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 110 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

111. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 111 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

112. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 112 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

113. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 113 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

114. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 114 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

115. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 115 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

116. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 116 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

117. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 117 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

118. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 118 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

119. Denied.

120. Denied.

121. Denied.

122. Denied.

123. Denied.

124. Denied.

125. Denied.

126. Denied.

127. Denied.

128. Denied.

129. Denied.

130. Denied.

131. Denied.

132. Denied.

133. Denied.

134. Denied.

135. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 135 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

136. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 136 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

137. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 137 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

138. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 138 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

139. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 139 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

140. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 140 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

141. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 141 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

142. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 142 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

143. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 143 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

144. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 144 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

145. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 145 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

146. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 146 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

147. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 147 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

148. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 148 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

149. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 149 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

150. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 150 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

151. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 151 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

152. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 152 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

COUNT I
UNFAIR COMPETITION IN VIOLATION OF THE LANHAM ACT,
15 U.S.C. § 1125(a)

153. Alliance incorporates its responses to Paragraphs 1 through 152, as set out above.

154. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 154 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

155. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 155 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

156. Alliance admits that its independent contractors and employees do not represent ADT. The remaining allegations are denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 156 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

157. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 157 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

158. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 158 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

159. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 159 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

160. Denied as to Alliance. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 160 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

161. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 161 of the Plaintiffs' Petition and,

as such denies same and demands strict proof thereof. Answering further Alliance denies that Plaintiffs are entitled to the relief for which they pray.

COUNT II
UNFAIR COMPETITION

162. Alliance incorporates its responses to Paragraphs 1 through 161, as set out above.

163. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 163 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

164. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 164 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

165. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 165 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

166. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 166 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

167. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 167 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

168. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 168 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

169. Denied as to Alliance. Alliance is without sufficient information to admit or deny the allegations contained in Paragraph 169 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

170. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 170 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof.

171. Denied as to Alliance. Alliance is without sufficient information to admit or deny the remaining allegations contained in Paragraph 171 of the Plaintiffs' Petition and, as such denies same and demands strict proof thereof. Answering further Alliance denies that Plaintiffs are entitled to the relief for which they pray.

AFFIRMATIVE DEFENSES

1. Plaintiff's claims are barred, in whole or in part, because to the extent that any sales representatives engaged in unlawful conduct, or made any false or misleading statements, they were acting outside of their authority, scope of employment or agency with Defendant.

2. Defendant Alliance Security, Inc. reserves the right to assert any other affirmative defenses and/or claims that may come to light during the course of discovery. Nothing in these affirmative defenses assumes a burden of proof by Defendant with respect to any fact or claim that is not otherwise imposed on Defendant by law.

Respectfully submitted,

HOLDEN & CARR

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Telephone (214) 745-8888
Facsimile (918) 295-8889

**ATTORNEYS FOR DEFENDANTS
ALLIANCE SECURITY INC.**

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document was served *via ECF notification* on August 25, 2015, on the following counsel of record in accordance with Federal Rules of Civil Procedure:

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s/Jeffrey D. Shelton

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